

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ROBERT FIREMAN and ANN RAIDER,

Plaintiffs,

v.

Civil Action No. 05-11740-MLW

NEWS AMERICA MARKETING IN-STORE,  
INC.,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR LEAVE  
TO FILE MEMORANDUM IN EXCESS OF 20 PAGES**

Pursuant to Local Rule 7.1 (B) (4), Defendant News America Marketing In-Store, Inc. ("NAM") moves for leave to file a memorandum in excess of 20 pages in opposition to Plaintiffs' Motion for Leave to Disclose Experts Beyond Expert Disclosure Date (the "Motion").

As grounds for the motion, NAM states that the Motion raises complex questions concerning two belatedly disclosed expert designations and two lengthy expert reports submitted therewith. More than 20 pages are needed to discuss fully the complicated factual and legal issues attendant to the Motion and the relief sought by the Motion.

NEWS AMERICA MARKETING IN-  
STORE, INC.

By its attorneys,

/s/ Gordon P. Katz  
Gordon P. Katz (BBO# 261080)  
Ieuan G. Mahony (BBO# 552349)  
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Dated: September 7, 2007

Boston, Massachusetts

**CERTIFICATE PURSUANT TO LOCAL RULES 7.1**

I, Gordon P. Katz, hereby certify pursuant to Rule 7.1 of the Local Rules of the United States District Court for the District of Massachusetts that I discussed on September 6, 2007, the within Motion with Kevin Peters, counsel for Robert Fireman and Ann Raider, and he stated that he did not oppose the Motion's allowance.

/s/ Gordon P. Katz  
Gordon P. Katz

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 7th day of September, 2007.

/s/ Gordon P. Katz  
Gordon P. Katz

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